

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS
Significant Permit Modification

IAC Strasburg, LLC
Strasburg, Shenandoah County, Virginia
Permit No. VRO80964

As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, IAC Strasburg, LLC has applied for a significant modification to the Title V Operating Permit for its plastic automotive interior trim component manufacturing facility. The Department has reviewed the application and has prepared a modified Title V Operating Permit.

Engineer/Permit Contact: _____
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(540) 574-7863

Date: 1/10/12

Air Permit Manager: _____
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Date: 1/12/12

Deputy Regional Director: _____
B. Keith Fowler

Date: 1/12/12

REQUESTED MODIFICATION

IAC Strasburg, LLC (IAC) operates a plastic automotive interior trim component manufacturing facility located at 806 East Queen Street, Strasburg, Virginia. Manufacturing processes include painting, injection molding, foam production, adhesive application, and rotocast molding.

IAC currently operates under a minor New Source Review (NSR) permit approved on November 15, 2010, as amended October 7, 2011. This permit covers the painting operations at the facility, including PL2-GB1-Line 1 (paint and glue application line), PL2-PAINT-R/T-020, and PL1-PAINT-1B (paint lines). Other operations at the facility are considered insignificant based on either rated capacity (fuel-burning equipment) or emissions levels (process equipment, including 69 injection molding machines, foam production equipment, and production support equipment). IAC requested limits on hazardous air pollutants (HAP) that were established in the Title V operating permit with an effective date of January 8, 2009, and will be considered an area source for any applicable MACT standards promulgated after that date. The existing foam fabrication lines are subject to 40 CFR 63, Subpart III – NESHAP for Flexible Polyurethane Foam Fabrication Operations.

The DEQ received an application from IAC dated June 27, 2011, as received June 28, 2011, requesting a significant modification to the facility's Title V operating permit. This modification will incorporate the changes made in the November 15, 2010 minor NSR permit modification. During the review of the Title V draft, DEQ determined that the language in Condition 4, Emission Controls, requiring the use of waterborne glues and coatings in the glue/paint application spray booth (PL2-GB1-Line 1) was redundant, as Conditions 6 and 7 specify the maximum allowable VOC content for the same materials to be used in this booth. DEQ requested the submittal of Form 7 from IAC to update the minor NSR permit in order to remove language from Condition number 4. The minor amendment to the minor NSR permit was approved on October 7, 2011.

The following changes were made to the minor NSR permit. Condition numbers reflect those in the permit approved on November 15, 2010, as amended 10/7/2011.

- Condition 3 – Emission Controls: Added minimum required filter control efficiency for PL2-PAINT-R/T-020 and PL1-PAINT-1B.
- Conditions 4 and 5 – Emission Controls: Added particulate matter for control by HVLP for PL2, GB1-Line1, PL2-PAINT-R/T-020, and PL1-PAINT-1B. Remove requirements for waterborne glues and coatings.
- Condition 7 – Emission Controls: Added average monthly VOC content requirement for paints used on PL2-GB1-Line 1.
- Condition 10 – Monitoring Device Observation: Added requirement that pressure drop gauges be observed no less than once per day on PL1-GB1-Line 1.

- Conditions 12, 13, and 14 – Throughputs: Replaced specific paint type throughputs with an annual VOC throughput on all three booths.
- Condition 15 and 16 – Emission Limits: Updated PM limits to account for filter control efficiency and added hourly VOC limit for PL1-PAINT-1B and PL2-PAINT-R/T-020.
- Condition 17 – Emission Limits: Added PM limits not previously included and increased hourly and annual VOC limits to account for increased material throughput for PL2-GB1-Line 1.
- Condition 19 – Records: Updated those records affected by changes noted above.
- State-only Enforceable Section: eliminated references to MIBK due to material changes. Added HDI, including emission limits, material throughput limits, and recordkeeping.

A mutual shutdown letter was received by the DEQ dated November 10, 2011 requesting the removal of Rotocast 1 (RC1) and ovens ((PL2-OV1 and PL2-OV2). The removal of this equipment affects Section II (Emission Units) and Section VI (Insignificant Activities) of the Title V operating permit.

REASON FOR MODIFICATION

IAC received a warning letter from the DEQ dated July 20, 2010 for failure to submit an initial notification for the minor NSR permit modification approved on January 8, 2009, and for failure to submit an application within 12 months of commencing operation for a modification to the Title V operating permit to incorporate these changes. Although the November 15, 2010 minor NSR permit superseded the January 8, 2009 permit, the application for the Title V modification dated June 27, 2011 includes the changes made in both the 2009 and 2010 minor NSR modifications. The Title V operating permit has been modified accordingly. The minor NSR permit dated November 15, 2010, as amended October 7, 2011 is provided as an attachment.

APPLICABILITY OF 9 VAC 5-80-230

Pursuant to 9 VAC 5-80-230, significant modification procedures must be used for those permit modifications that do not qualify as minor permit modifications under 9 VAC 5-80-210 or as administrative amendments under 9 VAC 5-80-200. The request submitted by IAC does not meet the definitions of either an administrative amendment or a minor permit modification. The regulations provide criteria that, any of which, require the use of the significant permit modification procedures. The modification proposed by IAC meets the criterion specified in 9 VAC 5-80-230 A.1, as follows:

Significant modification procedures shall be used for those permit modifications that involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit....

The Title V permit modification requires that the facility change the monitoring criteria from actual paint throughput to VOC throughput and add pressure drop monitoring on the paint booth fabric filters. There was also a decrease in allowable PM/PM-10 emissions, but the monitoring and recordkeeping changes involved only the additional requirement for pressure drop monitoring.

CHANGES TO TITLE V OPERATING PERMIT

The changes made to the Title V operating permit based on the request from IAC are indicated below and include the requirements from the minor NSR permit dated November 15, 2010, as amended October 7, 2011. The condition numbers listed refer to the existing Title V operating permit.

ALL: Updated language to most recent boilerplate. All references to the previous minor NSR permit referenced in the Title V permit (2/7/2008) have been updated to indicate the November 15, 2010 permit, as amended October 7, 2011. This does not represent a change to any of the underlying applicable requirements, except as noted in the conditions listed below.

Section I. Facility Information: Change contact person to – Ben Folmar, Human Resources Manager, (540) 465-6218

Section II. Emission Units: Change applicable permit date for unit PL1-PAINT-1B, PL2-PAINT-R/T-020, and PL2-GB1-Line 1 to 11/15/2010, as amended 10/7/2011. Remove RC1 and PL2-OV1 and OL2-OV2.

Section III. Surface Coating Equipment Requirements

A. Limitations – section was reorganized to group similar conditions

2. Add control efficiency requirement for filters for PL1-PAINT-1B and PL2-PAINT-R/T-020
3. Add Particulate Matter (PM) requirement for control by HVLP spray guns for PL2-GB1-Line 1. Remove requirement for the use of waterborne glues and coatings.
4. Add PM requirement for control by HVLP spray guns for PL1-PAINT-1B and PL2-PAINT-R/T-020
6. Deleted – annual throughput limit for Red Spot coating to PL1-PAINT-1B.
(Replaced with annual VOC throughput limit.)
7. Deleted – annual throughput limits for various materials to PL2-PAINT-R/T-020.
(Replaced with annual VOC throughput limit.)
8. Deleted – annual throughput limits for various materials to PL2-GB1-Line 1.
(Replaced with annual VOC throughput limit.)

10. PL1-PAINT-1B: PM/PM-10 hourly and annual emissions decreased based on filter information, added hourly VOC limit, and increased annual VOC limit based on new material usage.
11. PL2-PAINT-R/T-020: PM/PM-10 hourly and annual emissions decreased based on filter information, added hourly VOC limit, and increased annual VOC limit based on new material usage.
12. PL2-GB1-Line 1: PM/PM-10 hourly and annual emissions reduced, added hourly VOC limit and increased annual VOC limit.

Added – Minor NSR (11/15/2010, as amended 10/7/2011) condition numbers:

7. Maximum monthly average VOC content of paints used on PL2-GB1-Line 1.
12. Maximum annual VOC throughput for PL2-GB1-Line 1.
13. Maximum annual VOC throughput for PL1-PAINT-1B.
14. Maximum annual VOC throughput for PL2-PAINT-R/T-020.

B. Monitoring

2. Modified filter inspection language to reflect language in minor NSR.

C. Recordkeeping

1. Combined inspection recordkeeping condition with condition for pressure drop reading recordkeeping condition
2. Deleted – monthly recording of amounts of materials issued from storage.
7. Removed hourly recordkeeping requirement for PM.

Section VI. Insignificant Activities

Remove PL2-OV1 and PL2-OV2

Section IX. State-only Enforceable

A. Limitations

1. Deleted – mix ratio requirement for material used in PL2-PAINT-R/T-020. Replaced with VOC throughput.
2. Deleted – hourly and annual emission limits for MIBK. Material containing MIBK no longer used. Limits updated for HDI.

Added:

1. Hourly throughput requirement for coating material used in PL2-PAINT-R/T-020.
2. Annual throughput requirement for coating material used in for PL2-PAINT-R/T-020.
3. Hourly throughput requirement for coating material used in PL2-GB1-Line 1.
4. Annual throughput requirement for coating material used in PL2-GB1-Line 1.
5. Facility-wide hourly and annual emission limits for 1,6-hexamethylene diisocyanate (1,6-HDI).

B. Monitoring and Recordkeeping

1. Added references for PL2-PAINT-R/T-020 and PL2-GB1-Line 1 to emissions equations.
2. Deleted recordkeeping for material issued from storage, added hourly and annual 1,6-HDI recordkeeping, and daily records for material mix information.

PUBLIC PARTICIPATION

The public participation requirements of 9 VAC 5-80-270 apply to significant permit modifications. A public notice regarding these modifications will be placed in the Northern Virginia Daily, Strasburg, Virginia on November 22, 2011. The 30-day public comment period ran from November 23, 2011 through December 22, 2011. A draft copy was also forwarded to the EPA for a concurrent 45-day review, ending on January 6, 2012. The affected states, West Virginia and Maryland, and all persons on the Title V mailing list were also notified of the public notice. There were no comments received.

ATTACHMENT – Minor NSR permit, November 15, 2010, as amended October 7, 2011.